

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Raymond Conley

Case: 2:25-mj-30292

Assigned To : Unassigned

Assign. Date : 5/6/2025

Description: USA V. SEALED (DJ)

Case No.

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 29, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 6, 2025

City and state: Detroit, MI



*Complainant's signature*

Rebecca Childs, Special Agent

*Printed name and title*



*Judge's signature*

Hon. Kimberly G. Altman, U.S. Magistrate Judge

*Printed name and title*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Rebecca Childs, being duly sworn, depose and state the following:

**INTRODUCTION**

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code. I have been employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a Special Agent since January 2020. I have received extensive training from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I obtained a bachelor’s degree in Global Security and Intelligence Studies from Embry-Riddle Aeronautical University.

2. During my employment with ATF, I have conducted or participated in criminal investigations involving the possession and use of firearms, armed drug trafficking, and criminal street gangs, among other state and federal offenses.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

4. I have probable cause to believe that CONLEY, who knew he was prohibited from possessing firearms due to his felony convictions, knowingly possessed a firearm, which traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

## **PROBABLE CAUSE**

5. On or about November 29, 2024, at approximately 1:15 a.m., Detroit Police Department (DPD) officers were dispatched for two shots detected by the “Shot Spotter” system in the area of XXX10 Saint Aubin Street, Detroit, Michigan. Officers initially investigated a parked running vehicle in the area with no results. After the officers left the area, they were advised by dispatch that a female caller stated her boyfriend fired a round at XXX16 Saint Aubin Street. Officers returned to the area and knocked on the door of XXX16 Saint Aubin Street, with no answer. Officer Amarea Bradford observed an open side door and made entry to conduct a protective sweep due to shots allegedly being fired and no one answering the door.

6. While moving through the home, Officer Bradford encountered a black male, later identified as Raymond Elante CONLEY (DOB: XX/XX/1991), sitting on the couch in the living room. Officer Bradford gave multiple verbal commands for the CONLEY to stand up and show him his hands. CONLEY did not comply. Officer Kevin Smith observed the handle of a revolver protruding from the front right side of CONLEY’s hoodie pocket. Officer Bradford secured CONLEY as Officer

Smith removed a black and silver Smith & Wesson, Model 60, .357 caliber, revolver, bearing serial number: CHL9175, loaded with two spent shell casings and three live rounds, from CONLEY's pocket. A query of the firearm through the Law Enforcement Information Network (LEIN) revealed the firearm was stolen out of Livonia, Michigan.

7. The female caller returned to the location and advised officers that she and CONLEY had a verbal argument when CONLEY fired a gun in an unknown location from inside the home. She fled the location with her children. CONLEY was arrested and transported to the Detroit Detention Center without incident.

8. I reviewed records related to CONLEY's criminal history and learned that CONLEY has multiple prior felony convictions.

9. On October 24, 2013, CONLEY was sentenced for the following two felonies in the Third Judicial Circuit Court, Wayne County, Michigan, both of which he pled guilty to:

- a. One (1) count of unarmed robbery. Sentenced to 6-15 years confinement.

- b. One (1) count of assault with intent to do great bodily harm less than murder or by strangulation. Sentenced to 4-10 years confinement.

10. On November 12, 2013, CONLEY was sentenced for the following three felonies in the Third Judicial Circuit Court, Wayne County, Michigan, all of which he pled guilty to:

- a. One (1) count of second-degree home invasion.  
Sentenced to 3-15 years confinement.
- b. One (1) count of larceny from the person.  
Sentenced to 3-10 years confinement.
- c. One (1) count larceny in a building. Sentenced to 2-4 years confinement.

11. On December 2, 2013, CONLEY was sentenced to 1 year and 7 months to 15 years confinement for second-degree home invasion in the Third Judicial Circuit Court, Wayne County, Michigan.

12. Prior to his release, CONLEY on January 19, 2023, signed the Michigan Department of Corrections “Prisoner Pre-Release Notice” stating that “AS A CONVICTED FELON, THIS IS A FORMAL

NOTICE THAT YOU ARE SUBJECT TO THE FOLLOWING  
FEDERAL FIREARMS STATUTES AND MICHIGAN PAROLE  
CONDITION: USING, CARRYING OR POSSESSING A FIREARM OR  
AMMUNITION [18 USC 922(g) AND USC 924 (e)] If you use, brandish,  
display, carry or otherwise possess a firearm, you are in violation of this  
federal statute, which is punishable by a minimum of 5 years (and up to  
10 years) imprisonment without parole...”

13. Based on the above felony convictions, with multiple sentences exceeding one year, and CONLEY’s signed acknowledgement of the Michigan Department of Corrections “Prisoner Pre-Release Notice,” CONLEY would have been aware of his status as a felon.

14. On April 25, 2025, I contacted ATF Interstate Nexus Expert Special Agent Kara Klupacs and provided information about the black and silver Smith & Wesson, Model 60, .357 caliber, revolver, bearing serial number: CHL9175. SA Klupacs concluded that the firearm was manufactured outside the State of Michigan and therefore traveled in and affected interstate commerce. Further, she opined that the revolver is a firearm as defined in 18 U.S.C. § 921(a)(3).

## CONCLUSION

15. Probable cause exists that on or about November 29, 2024, in the Eastern District of Michigan, Southern Division, Raymond CONLEY knowing that he had previously been convicted of a crime punishable by more than one year of imprisonment, knowingly possessed a firearm, that had travelled in or affected interstate commerce in violation of 18 U.S.C. § 922(g)(1).



---

Rebecca Childs, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means



---

Honorable Kimberly G. Altman  
United States Magistrate Judge

Dated: May 6, 2025